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Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
EDGAR BRONFMAN, JR.,	:	
	:	
Plaintiff,	:	
	:	No. 07-CV-2875 (GBD)
v.	:	
	:	
VIVENDI S.A., THE BENEFIT EQUALIZATION	:	
PLAN OF VIVENDI S.A., AND THE HUMAN	:	
RESOURCES COMMITTEE OF THE BOARD OF	:	
DIRECTORS OF VIVENDI S.A.,	:	
	:	
Defendants.	:	
-----	x	

No. 07-CV-2875 (GBD)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the declaration of David M. Bigge dated May 8, 2007 and the accompanying memorandum of law; the stipulation by the parties dated May 25, 2007; the attached Memorandum of Law; and all other papers previously filed in this action, Defendants Vivendi Holding I Corporation, the Benefit Equalization Plan of Vivendi S.A., and Sarah Frank, in her capacity as a member of the Human Resources Committee of the Board of Directors of Vivendi S.A. shall move before the Honorable George B. Daniels, in the United States District Court for the Southern District of New York, at such time as the Court shall designate, for an order dismissing the Complaint.

Dated: New York, New York
May 30, 2007

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

By: /s/ Joseph P. Moodhe

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